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Attorneys for Defendant

DISCORD INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ZHEA ZHEA ZARECOR AS PERSONAL
REPRESENTATIVE OF ZHEA ZARECOR
SALAZAR, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

DISCORD INC.,

Defendant.

Case No. 3:23-cv-05385-JSC

**FIFTH STIPULATION TO EXTEND TIME
TO RESPOND TO COMPLAINT (L.R. 6-1)**

Complaint Filed: October 20, 2023

Complaint Served: November 29, 2023

Current Response Date: March 25, 2024

New Response Date: April 15, 2024

CLASS ACTION

1 Plaintiff Zhea Zhea Zarecor as Personal Representative of Zhea Zarecor Salazar (“Plaintiff
2 Zarecor”) and Defendant Discord Inc. (“Discord”), pursuant to Local Rule 6-1, hereby stipulate to the
3 following extension of time for Discord to respond to the Complaint:

4 **WHEREAS**, on October 20, 2023, Plaintiff Zarecor filed her Complaint alleging, on behalf of
5 herself as personal representative of Zhea Zarecor Salazar and a proposed nationwide class, violations
6 of California’s Unfair Competition Law (Cal. Bus. & Prof. Code § 17200, et seq.), violations of
7 California’s Consumer Legal Remedies Act (“CLRA”) (Cal. Civ. Code § 1750, et seq.), violations of
8 California Business and Professional Code §§ 17500, et seq., violations of Texas’ Deceptive Trade
9 Practices-Consumer Protection Act (“DTPA”), and unjust enrichment by Discord;

10 **WHEREAS**, on November 29, 2023, Plaintiff Zarecor served her Complaint on Discord;

11 **WHEREAS**, pursuant to Rule 12(a)(1) of the Federal Rules of Civil Procedure, Discord’s
12 response to the Complaint was due on December 20, 2023;

13 **WHEREAS**, Discord conferred with Plaintiff’s counsel and requested that Plaintiff agree to
14 extend the time for Discord to respond to the Complaint to January 19, 2024 (a 30-day extension);

15 **WHEREAS**, Plaintiff agreed to Discord’s request to extend the time for Discord to respond to
16 the Complaint to January 19, 2024;

17 **WHEREAS**, on December 19, 2023, Discord filed a joint stipulation to extend the time for it
18 to respond to the Complaint to January 19, 2024 (Dkt. No. 9);

19 **WHEREAS**, Discord conferred with Plaintiff’s counsel and requested that Plaintiff agree to
20 extend the time for Discord to respond to the Complaint to February 19, 2024 (a 31-day extension);

21 **WHEREAS**, Plaintiff agreed to Discord’s request to extend the time for Discord to respond to
22 the Complaint to February 19, 2024;

23 **WHEREAS**, on January 17, 2023, Discord filed a second joint stipulation to extend the time
24 for it to respond to the Complaint to February 19, 2024 (Dkt. No. 20);

25 **WHEREAS**, Discord conferred with Plaintiff’s counsel and requested that Plaintiff agree to
26 further extend the time for Discord to respond to the Complaint to March 4, 2024 (a 14-day extension);

27 **WHEREAS**, Plaintiff agreed to Discord’s request to extend the time for Discord to respond to
28 the Complaint to March 4, 2024;

1 **WHEREAS**, on February 19, 2023, Discord filed a third joint stipulation to extend the time
2 for it to respond to the Complaint to March 4, 2024 (Dkt. No. 24);

3 **WHEREAS**, Discord conferred with Plaintiff's counsel and requested that Plaintiff agree to
4 further extend the time for Discord to respond to the Complaint to March 25, 2024 (a 21-day
5 extension);

6 **WHEREAS**, Plaintiff agreed to Discord's request to extend the time for Discord to respond to
7 the Complaint to March 25, 2024;

8 **WHEREAS**, on March 4, 2023, Discord filed a fourth joint stipulation to extend the time for
9 it to respond to the Complaint to March 25, 2024 (Dkt. No. 26);

10 **WHEREAS**, the parties are engaged in productive discussions regarding the possibility of an
11 early resolution of this matter, and Discord has conferred with Plaintiff's counsel and requested that
12 Plaintiff agree to extend the time for Discord to respond to the Complaint to April 15, 2024 (a 21-day
13 extension) in order to facilitate such discussions;

14 **WHEREAS**, Plaintiff agreed to Discord's request to extend the time for Discord to respond to
15 the Complaint to April 15, 2024;

16 **WHEREAS**, the requested extension will not affect any dates set by the court; and

17 **WHEREAS**, this is the fifth stipulation by the parties for an extension of time for Discord to
18 respond to the Complaint.

19 **IT IS HEREBY STIPULATED** by and between the parties that Discord's date to respond to
20 the Complaint, by answer, motion, or otherwise, is extended to and including **April 15, 2024**.

21
22 Dated: March 25, 2024

KALIELGOLD PLLC

23
24 By: /s/ Sophia G. Gold

JEFFREY D. KALIEL
SOPHIA G. GOLD
SCOTT EDELSBERG

25
26 Attorneys for Plaintiff
27
28

1 Dated: March 25, 2024

KING & SPALDING LLP

2
3 By: /s/ Quyen L. Ta

4 QUYEN L. TA

ALVIN LEE

5 Attorneys for Defendant

6 DISCORD INC.

7
8 **L.R. 5-1 ATTESTATION**

9 I, Quyen L. Ta, attest that all signatories listed herein, and on whose behalf this filing is
10 submitted, concur in this filing's content and have authorized this filing.

11 By: /s/ Quyen L. Ta

12 QUYEN L. TA